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11 UNITED STATES DISTRICT COURT

12 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

13 WAYMO LLC,

14 Plaintiff,

15 CASE NO. 3:17-cv-00939-WHA

vs.

16 UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANTS UBER TECHNOLOGIES,
INC. AND OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL THEIR SUR-REPLY TO
WAYMO'S MOTION TO COMPEL UBER
SOURCE CODE**

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1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants’ Uber Technologies, Inc. and
 7 Ottomotto LLC’s Administrative Motion to File Under Seal Their Sur-Reply to Waymo’s Motion to
 8 Compel Uber Source Code (the “Administrative Motion”). The Administrative Motion seeks an order
 9 sealing highlighted portions of Defendants’ Sur-Reply to Waymo’s Motion to Compel (“Uber’s Sur-
 10 Reply”), the Declaration of Don Burnette (“Burnette Declaration”), and Exhibit 1 to the Declaration of
 11 Esther Chang (“Chang Exhibit 1”), as well as the entirety of Exhibits A-B to the Declaration of Don
 12 Burnette (“Burnette Exhibits A-B”) and Exhibit 2 to the Declaration of Esther Chang (“Chang Exhibit
 13 2”).

14 3. The green and blue highlighted portions of Uber’s Sur-Reply, of the Burnette
 15 Declaration, and of Chang Exhibits 1-2, as well as the entirety of Burnette Exhibits A-B contain or
 16 refer to trade secrets and confidential business information, which Waymo seeks to seal.

17 4. Uber’s Sur-Reply (green highlighted portions), the Burnette Declaration (green and
 18 blue highlighted portions), Burnette Exhibits A-B (entire documents), Chang Exhibit 1 (green and
 19 blue highlighted portions), and Chang Exhibit 2 (portions highlighted in green in version filed
 20 herewith) contain, reference, and/or describe Waymo’s asserted trade secrets, including as
 21 misappropriated by Defendants. The information Waymo seeks to seal includes the confidential
 22 design and functionality of Waymo’s proprietary autonomous vehicle system, including its source
 23 code, which Waymo maintains as secret. I understand that these trade secrets are maintained as secret
 24 by Waymo (Dkt. 25-47) and that the trade secrets are valuable to Waymo’s business (Dkt. 25-31).
 25 The public disclosure of this information would give Waymo’s competitors access to descriptions of
 26 the functionality or features of Waymo’s autonomous vehicle system. If such information were made
 27 public, I understand that Waymo’s competitive standing would be significantly harmed.

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1 5. Uber's Sur-Reply (green highlighted portions) additionally contains, references, and/or
 2 describes Waymo's highly confidential and sensitive business information. The information Waymo
 3 seeks to seal regards confidential details regarding Waymo's business, including details about
 4 potential partnerships. I understand that this confidential business information is maintained by
 5 Waymo as secret. The public disclosure of this information would give Waymo's competitors access
 6 to Waymo's business strategy for its autonomous vehicle system. If such information were made
 7 public, I understand that Waymo's competitive standing would be significantly harmed.

8 6. Waymo's request to seal is narrowly tailored to those portions of Uber's Sur-Reply, the
 9 Burnette Declaration, Burnette Exhibits A-B, and Chang Exhibits 1-2 that merit sealing.

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11 I declare under penalty of perjury under the laws of the State of California and the United
 12 States of America that the foregoing is true and correct, and that this declaration was executed in San
 13 Francisco, California, on October 19, 2017.

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By /s/ Felipe Corredor

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Felipe Corredor
 Attorneys for WAYMO LLC

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ATTESTATION

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In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
 document has been obtained from Felipe Corredor.

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By: /s/ Charles K. Verhoeven
 Charles K. Verhoeven